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Site: Wells G+H
Break: 11.9
Other: Whitney Barrel Co.

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February 16, 1988

Ms. Barbara Newman
U.S. Environmental Protection Agency
Region I
JFK Federal Building
Boston, MA 02203

RE: CERCLA/RCRA Information Request - Whitney Barrel Co.

Dear Ms. Newman:


Pursuant our conversation and correspondence on the referenced Information Request, I am enclosing herewith the responses of John E. Whitney, III and Ruth J. Whitney, son and widow, respectively, of the late owner of Whitney Barrel Co., Inc. These responses are as complete as possible at this time, and will be supplemented in the event that any new information becomes available.

There is very little corporate documentation available for Whitney Barrel, primarily due to two major fires at the Facility in 1977 and 1979, but also due to the late Mr. Whitney's practice of keeping only minimal records and files. Neither John E. Whitney III nor Ruth J. Whitney participated in the management of Whitney Barrel and so their knowledge of the company details is very limited. As agreed and required, we are continuing to attempt to obtain records and documents that are available, principally purchase order records showing former customers and copies of insurance policies. The original customer records were given to Henry Guzman, DEQE Legal Office, on January 21, 1988 and we are awaiting their return. Insurance policies were requested of Whitney Barrel's insurance agent by letter of January 26, 1988 but have not been received as yet.

We hope to be able to provide the additional documents by March 11, 1988 and will contact you if unable to meet that date. Please advise me in writing should you desire any clarifications of the responses provided today.

Yours truly,

LANTZ AND MULFORD


John J. Gushue

Enclosure (1)

cc: J. Whitney
H. Guzman, DEQE

RESPONSES OF JOHN E. WHITNEY, III TO
REQUEST FOR INFORMATION REGARDING WHITNEY
BARREL CO. INC., 256 SALEM STREET, WOBURN, MA

The following responses are provided to the U.S. Environmental Protection Agency's Wells G & H First Information Request received by Mr. John E. Whitney, III on January 23, 1988. Both the questions and responses are provided.

1. Identify the person(s) answering these Questions on behalf of Respondent.

1. Response - These answers have been provided by John E. Whitney, III, No. 4 Campground Road, Boxford, MA 01921, the son of the late owner of Whitney Barrel Co., Inc., and a former employee of the company; and Mrs. Ruth J. Whitney, 44 Four Mile Village, Boxford, MA 01921, widow of the late owner of the company.

2. For each and every question contained herein, identify all persons consulted in the preparation of the answer.

2. Response - None required; see each answer.

3. For each and every Question contained herein, identify all documents consulted, examined, or referred to in the preparation of the answer and provide true and accurate copies of all such documents.

3. Response - None required; see each answer.

4. List the EPA RCRA Identification Numbers of the Respondent, if any.

4. Response - Facility ID No. MAD019725324, obtained from a computer printout of generators in Region I dated 9/26/86.

5. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

5. Response - None required; see each answer.

6. Identify all persons, including Respondent's employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to, the Facility.

6. Response - Whitney Barrel Co., Inc. effectively ceased its operations in early 1985 following the death of John E. Whitney, Jr., its owner in August 1984. Neither John E. Whitney, III nor Ruth J. Whitney have any information as to the identity or location of former employees, except for the following: Anthony Carchide, REDACTED - PERSONAL PRIVACY, and Daniel Paige, REDACTED - PERSONAL PRIVACY

REDACTED - PERSONAL PRIVACY

The company's employees were generally unskilled laborers who often only worked for Whitney Barrel for short durations. There are no historical payroll records available to our knowledge. Other persons who may have knowledge or information about the Facility and its operations may include former customers of the company, who will be identified in further answers to be provided upon receipt of customer records that are now in the possession of Henry Guzman, DEQE Legal Office, Boston.

7. For each and every Question contained herein, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained.

7. Response - None required; see each answer.

8. Identify the current owner and type of operation occurring at the Facility. State the dates during which the current owner owned, operated or leased any portion of the facility and provide copies of all documents evidencing or relating to such ownership, operation or lease, including, but not limited to, purchase and sale agreements, deeds, leases, etc.

8. Response - Current owner of 256 Salem Street property is Mrs. Ruth J. Whitney, who acquired title to the property under the will of her late husband, John E. Whitney, Jr., who died on August 14, 1984. The will was probated in Middlesex, S.D. Probate Court, No. 84P-51177. Mrs. Whitney leases the property to several individuals and businesses identified in answer no. 10 below.

9. Identify all prior owners of the Facility. For each prior owner, further identify:

- a. The dates of their ownership.
- b. Any evidence that hazardous materials were released or threatened to be released at the Facility during the period that they owned the Facility.

9a. Response - From initial deed research conducted at the Middlesex, S.D. Registry of Deeds, prior owners include:

1. unknown to 11/25/50, Daniel J. Quinn, now deceased
2. unknown to 12/19/57, Eleanor F. O'Connor, believed deceased
3. 11/25/50 to 1964, John E. Whitney, Sr. and Helen T. Whitney
4. 1964 to 1972, Helen T. Whitney, deceased
5. 1972 to 8/13/76, John E. Whitney, Jr. and Walter W. Whitney
6. 8/13/76 to 7/20/78, John E. Whitney, Jr. and Helen R. Whitney
7. 7/20/78 to 8/14/84, John E. Whitney, Jr., now deceased
8. 8/14/84 to present, Ruth J. Whitney

9b. Response - In 1979, the Massachusetts DWPC filed suit in Suffolk Superior Court against Whitney Barrel Co., Inc. for alleged

discharges of toxic chemicals by Kingston Steel Barrel, a former customer of Whitney Barrel, into an MDC sewer on 12/13/78. A copy of the complaint is provided as Attachment 1 hereto. Further information about this suit has been requested of Henry Guzman, DEQE Legal Office, and will be provided when available. Mr. Leroy Beaudreau, Ryan Barrel Company, Peabody, MA, formerly of Kingston Steel Barrel Co., may have additional information or documents. In February 1985, the Remedial Investigation contractor for the Wells G & H study, NUS Corporation, attempted to install a well on the Whitney property east of the main building. NUS reported encountering a black sludge-like material during drilling at a depth of 3.5 feet. From air monitoring of the borehole, organic vapors were reported at a concentration of approximately 250 parts per million (ppm). We do not have any documentation of the NUS work.

10. Identify the current and prior operators and lessors of the Facility. For each such operator or lessor, further identify:

- a. The dates of their operations at, or lease of, the Facility.
- b. The nature of their operations at the Facility.
- c. All evidence that materials were released or threatened to be released at the Site during the period in which they were operating at the Facility, including but not limited to, M.G.L. 21 E inspections, NPDES permits, any correspondence with the local, state or federal government, and interviews with employees.

10a. and 10b. Response - We have no information concerning prior operators or lessors, except that we believe that in the mid-1960's, Hero Chemical, now Hero Coatings, Everett, MA used a part of the Facility for glue manufacturing. Currently, the Facility, or portions of it, are leased or rented to several individuals or businesses as itemized below:

1. Robert Jones, American Artesian Well Co., Woburn, MA, rents yard space for parking of trucks and equipment.
2. John Anderson, Anderson Oil Co., 10 Felton Street, Woburn, MA, rents building space to park trucks.
3. Edmund Lynch, Wayside Storage Trailers, Somerville, MA, rents yard space for parking of storage trailers.
4. Robert Hernon, Hernon Construction Co., Winchester, MA, rents yard space for parking trucks and equipment.
5. Murray Ross, Woburn, MA, rents parking space.
6. Bruce Marchand, Washington Street, Woburn, MA, rents building space for woodworking business.
7. Phillip Chimento, Woburn, MA, rents building space for auto repairs.
8. Steven Allen, Allen Glass Co., Woburn, MA, rents building space for auto glass repair.

9. Al Stackpole, Cambridge, MA, rents building space for equipment repairs (street sweepers).
 10. All Star Towing, Woburn, MA, rents yard space for storage of vehicles.
 11. Warren O'Leary, Woburn, MA, rents yard space for parking trucks.
- 10c. Response - We have no evidence of any releases or threatened releases of materials from the current occupants of the Facility. The floor drain in the main building is still operative and may receive wash water from vehicle washing by current occupants.
11. Describe your past and present activities at the Facility. Describe any prior activities at your Facility by any predecessors identified in response to questions # 8 -10 above.
11. Response - We have no information concerning activities of property owners prior to the purchase of the property by John E. Whitney, Sr. and Helen T. Whitney in 1950. Whitney Barrel Co., Inc. conducted drum and tank reconditioning and recycling activities at the Facility from 1950 to early 1985. The activities of current occupants are described in answer no. 10 above.
12. Describe the physical characteristics of the Facility including but not limited to the following:
- a. Surface structures (e.g., buildings, tanks, etc.)
 - b. Ground water wells, including drilling logs.
 - c. Past and present storm water drainage system, sanitary sewer system, including septic tank(s) and subsurface disposal field(s).
 - d. Underground storage tanks containing any petroleum products, including the age and size of the tank and the type and quantity of petroleum stored.
 - e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Facility, or to the property itself (e.g., excavation work) and state the dates on which such changes occurred.
- 12a. Response - There are two buildings located on the property, one is a small wood-frame, two story structure and the other is the main building of wood and sheet metal construction. The property includes approximately 2.6 acres of land. There are two aboveground tanks on the property, one abandoned tank of 6,000 gallons containing an unknown solid material and one active tank of 500 gallons containing diesel fuel used by Hernon Construction.

- 12b. Response - There are no wells on the property.
- 12c. Response - There is a floor drain in the main building which is believed to be connected to the MDC sewer system. There are no sanitary facilities in the main building. There is a septic system serving the small wood-frame building. Further information on the sewer and storm drain systems will be developed by GHR Engineering as part of their MGL, Chapter 21E study (See answer no. 15 below).
- 12d. Response - There are no known underground storage tanks at the Facility.
- 12e. Response - The main building was reconstructed in 1980 after a fire destroyed the building and all its contents in 1979.
13. Describe the acts or omission of any persons, other than your employees, agents or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Site or at the Facility and the damages relating therefrom and identify such persons. In addition, describe all precautions that you took against foreseeable acts or omissions of any such third parties and the consequences that could foreseeably result from such acts or omissions.
13. Response - We are not aware of any specific acts or omissions of other persons, other than Kingston Steel Barrel as referred to in answer no. 9b. Whitney Barrel Co., Inc. installed fencing and locked the gates to protect the property. There were several severe fires at the Facility, in 1965, 1973, 1977 and 1979, and it is possible that, in fighting the fires, the large quantities of water used could have caused releases of materials that otherwise were confined to drums or tanks being recycled.
14. Provide all existing technical or analytical information about the Facility, including but not limited to data and documents related to soil, water (ground and surface), geology, geohydrology, or air quality on and about the Facility.
14. Response - We have no such information at this time. See answer no. 15 below.
15. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrogeology or air quality on or about the Facility? If so, identify:
- a. What the nature and scope of these investigations will be.
 - b. The contractors or other persons that will undertake these investigations.

- c. The purpose of the investigations.
 - d. The dates when such investigations will take place and be completed.
 - e. Where at the Facility such investigations will take place.
- 15a. Response - In response to a Notice of Responsibility (NOR) letter issued to Whitney Barrel Co., Inc. by the Massachusetts DEQE, Whitney Barrel has proposed to engage a consultant to perform an investigation of the Facility pursuant to the Draft Massachusetts Contingency Plan. The NOR letter is attached hereto as Attachment 2.
- 15b. Response - GHR Engineering Associates, Inc., 1050 Waltham Street, Lexington, MA 02173
- 15c. Response - The primary purpose of the GHR study is to evaluate conditions at the Facility in order to confirm the existence and establish the extent of the alleged release of oil and/or hazardous material as described in the DEQE NOR letter. The proposed sampling and analysis program will provide the information needed to classify the Facility (i.e., Disposal Site or Priority Disposal Site) under MGL, Chapter 21E. The objectives of the study are as follows:
- (1) Development of a Facility characterization based on background information review and field investigation. The characterization will include the history of use and the geologic and hydrogeologic regime of the property.
 - (2) Definition of the presence, nature and extent of oil and/or hazardous materials, if any, in the groundwater and/or soil. The determination will be made by means of an extensive field investigation and comprehensive laboratory analysis. Potential exposure pathways for human and environmental receptors near the Facility will also be identified.
 - (3) Determination of the need for any short-term (immediate) remedial measures and for any further assessment, as required by DEQE.
- 15d. Response - We are awaiting DEQE review and approval of the GHR Work Plan. When started, the work is expected to take 7 to 9 months.
- 15e. Response - See Attachment 3 hereto for the details of GHR's proposed investigation.
16. At the time you acquired the parcels of the Facility, did you know or have reason to know that any material was disposed of on, in, or at the Facility? Describe all investigations of the Facility you undertook prior to acquiring/leasing the Facility and all of the facts on which you base the answer to the preceding question.

16. Response - The property was acquired by the late John E. Whitney, Sr. in 1950. We have no information with which to respond to this question.

17. Have you ever generated, purchased, stored, treated, disposed, or otherwise handled at the Facility any materials, including, but not limited to, drums, tanks or barrels that contained or may have contained materials? If the answer to the preceding question is anything but an unqualified "no" identify:

- a. In general terms, the nature and quantity of the non-hazardous materials so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.
- b. The chemical composition, characteristics, physical state (e.g., solid, liquid) and quantity of each hazardous material so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.
- c. The persons who supplied you with and transported to you each such hazardous material.
- d. How each such hazardous material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
- e. When each such hazardous material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
- f. Where each such hazardous material was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you. Specify, with drawings and maps, where exactly on your property, the material was handled in any of the above manners.

17a. Response - The business of Whitney Barrel was the reclaiming and/or reconditioning of drums, tanks and other steel or metal items. We have no information or knowledge as to other types of materials that may have been within said recyclables. Except for the corporate records provided to DEQE (see answer no. 6 above), we have no information on quantities.

17b. Response - No hazardous materials were purchased by Whitney Barrel to our knowledge except for 3 to 4 drums per year of Mobil Solvisol No. 5 (paint thinner) used in mixing drum enamel paint used to repaint cleaned drums and tanks. The raw drums and tanks brought to the Facility for recycling may have contained residues of a variety of industrial chemicals and oils, but we have no specific information on chemical composition or quantity.

17c. Response - See answer no. 6 above regarding corporate records as to former customers of Whitney Barrel that sent materials to the Facility for recycling. Whitney Barrel purchased its paint from Printers Oil Co., Ballardvale Road, Wilmington, MA, and its

paint thinner from Stevens Paint Corporation, Yonkers, N.Y.

17d. Response - See answer no. 19 below.

17e. Response - Whitney Barrel operated at the Facility from 1950 to early 1985, although the volume of drum/tank reconditioning done after the fire of May 1979 was significantly reduced.

17f. Response - In truckloads, drums and other items were driven in from Salem Street, brought to the back of the main building and unloaded. The materials were then cleaned, reconditioned, and stored on the premises until they were resold. Drums and small items were cleaned inside the main building. Large items and tanks were cleaned outside the building.

18. Have you ever disposed of, removed from, or stored, barrels, drums or tanks on the Wildwood Conservation Corporation property, formerly owned by John J. Riley Tannery Company and Beatrice Foods Inc., located just north of your property? If the answer to the above question is yes, please answer the following:

- a. Where these drums and tanks were stored, disposed of, or removed from;
- b. What was in these drums and tanks at the time of disposal; and
- c. Has there ever been any verbal or written agreement between the owner of that property and yourself for access to dispose, store, or remove barrels and tanks from or to that property. Specify the nature of that agreement and the date.

18. Response - No.

19. Please explain the exact process of barrel and tank reclamation at your facility. This explanation should include, but not be limited to:

- a. Where the dirty drums and tanks were stored before cleaning.
- b. What utensils and cleaning agents were used to clean them.
- c. Where the effluent or discharge from the drums and tanks was poured or disposed of after they were cleaned.
- d. Where the residue in the barrels was disposed of prior to cleaning.

19a. Response - Prior to the 1977 fire, the raw drums and tanks were stored in what was called the "raw warehouse" before cleaning. The warehouse was formerly located behind (north of) the existing main building. Items too large to store inside were stored outside the warehouse where space allowed. After the warehouse was destroyed, all materials were stored behind the main building.

- 19b. Response - Drums and small items were cleaned in wash tanks inside the main building. The wash tanks provided automated, high velocity spraying of boiling water and trisodium phosphate cleaning solution followed by rinsing with a boiling water spray. The cleaned items were then dried with a vacuum-type dryer, prepared for painting by buffing, if necessary, and painted with drum enamel paint thinned by Solvisol no. 5.
- 19c. Response - The wash tank wash water was discharged into the floor drain in the main building.
- 19d. Response - Generally, drums and tanks accepted by Whitney Barrel for recycling were empty except for residues that may have been on the surfaces or bottom of the items. Drums that were not empty were rejected and sent back to their source. Therefore, no special handling of residues was performed; residues were disposed along with the wash water.
20. Have you ever discharged liquid to the MDC or Woburn sewer system? If the answer is yes, please describe and provide copies of your permits. In addition, provide all results of the analyses of the liquid, if any.
20. Response - We believe that the floor drain in the main building is or was connected to the MDC system. At one time, Whitney Barrel had an MDC Permit, number 43-000288-8. We have requested permission to review and copy this permit file from Bonnie Hale, MWRA, 100 First Avenue, Boston, MA 02129 (telephone 242-6000) ext. 1117, and will forward a copy of the permit when we obtain it. No laboratory analyses were done on the wash water by Whitney Barrel Co., Inc. The MDC occasionally tested the wash tanks and test results may be available from the MWRA.
21. Are you or your consultants planning to remove, replace, insert, or alter in any way any physical structure listed in question 12?
21. Response - No.
22. Identify all leaks, spills or releases or threats of releases of any kind, into the environment of any hazardous materials and/or petroleum products that have occurred or may occur at or from the facility. In addition, identify:
- a. When such releases occurred or may occur.
 - b. How the releases occurred or may occur.
22. Response - We have no personal knowledge with which to respond to this question. It is possible that in cleaning items being recycled, any residues that were on or in the items could have been discharged with the wash water into the floor drain. Further information may become available upon review of the DEQE file referred to in answer no. 9b above. There were several severe fires at the Facility. The 1977 fire destroyed the warehouse building and the 1979 fire destroyed the main building

and its contents, and many items awaiting reconditioning exploded and/or were blown out of the building. We believe that the tremendous quantities of water used to fight the fires could have flushed out any materials inside the buildings that would have otherwise been contained and handled in the normal process of the company's operations.

23. If any release or threatened release identified in response to Question 22 above, occurred into any subsurface disposal system or floor drain inside or under any buildings located on the Facility, further identify:

- a. Where precisely, the disposal system or floor drains are and were located.
- b. When the disposal system or floor drains were installed.
- c. Whether the disposal system or floor drains were connected to any pipes.
- d. When such pipes were installed and where are they located.

23a. Response - The floor drain is located about 5 feet from the rear entrance to the main building.

23b. Response - It is believed that the floor drain was installed in 1950 or 1951 at the time the building was first constructed.

23c. Response - The floor drain is believed to be connected only to the MDC sewer line north of the property.

23d. Response - We do not know when the MDC sewer line was installed.

24. Identify all liability insurance policies held by Respondent. In identifying such policies, state:

- a. The name and address of each insurer and of the insured;
- b. The amount of coverage under each policy;
- c. The commencement and expiration dates for each policy;
- d. Whether or not the policy contains a "pollution exclusion" clause; and
- e. Whether or not the policy covers sudden, nonsudden or both types of accidents.

In lieu of providing this information, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials.

24. Response - We have requested copies of any insurance policies that may have been purchased by Whitney Barrel from Mr. Paul Nutile, Fridolin and Gilgun Insurance, 623 Main Street, Woburn,

MA 01801 (telephone 933-1188) and will provide copies when they are available.

25. Provide all financial statements for the past five fiscal years, including, but not limited to, those filed with the federal and state Internal Revenue Service and Securities and Exchange Commission.

25. Response - We have no corporate records for Whitney Barrel in our possession and believe all records were destroyed in the fires, except for the customer records referred to in answer no. 6 above. The late John E. Whitney, Jr. ran the company himself and neither John E. Whitney, III nor Ruth J. Whitney participated in corporate management or record keeping.

26. Identify all of Respondent's current assets and liabilities and person(s) who currently own or are responsible for such assets and liabilities.

26. Response - Whitney Barrel Co., Inc. went out of business in early 1985 and has no current assets or liabilities to our knowledge. The land and buildings at the Facility are owned by Ruth J. Whitney through the will of her late husband, John E. Whitney, Jr. Whitney Barrel Co., Inc. did not own the Facility.

27. Identify all subsidiaries and parent corporations of Respondent.

27. Response - None.

28. Provide a copy of the most current Articles of Incorporation and By-Laws of Respondent.

28. Response - Articles of Organization are attached hereto as Attachment 4. We do not have copies of any By-Laws.

29. Identify the managers and majority shareholders of Respondent and the nature of their management duties or amount of shares held respectively.

29. Response - We do not believe that Whitney Barrel ever issued any stock. The company went out of business in early 1985.

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